

**League of Women Voters of
Northern Nevada**

REC'D - BLM - NSO
9:00 SEP 19 2011
A.M.

P.O. Box 4381
Carson City, NV 89702
September 15, 2011

Penny Woods, Project Manager
BLM State Office
P.O. Box 12000
Reno, NV 89520-0006

Dear Ms. Woods:

The League of Women Voters of Northern Nevada strongly opposes the building of the pipeline proposed by the Southern Nevada Water Authority for a number of environmental and social reasons. We urge the BLM to choose the "No Action" alternative in response to the Environmental Impact Statement for the Water Authority's requested rights-of-way through BLM land in White Pine, Lincoln, and Clark counties.

The League of Women Voters of the United States has a strong position statement regarding interbasin water transfers.

- "Environmental costs of water transfers may include quantitative and qualitative changes in wetlands and related fisheries and wildlife, diminished aquifer recharge and reduced stream flows. Lowered water tables also affect groundwater quality and cause land subsidence.
- As we look to the future, water transfer decisions will need to incorporate the high costs of moving water, the limited availability of unallocated water and our still limited knowledge of impacts on the affected ecosystems.

...The process for evaluating the suitability of new proposed interbasin water transfers should include ...

- Evaluation of economic, social and environmental impacts in the basin of origin, the receiving area and any area through which the

diversion must pass, so that decision makers and the public have adequate information on which to base a decision;

- Examination of all short- and long-term economic costs including, but not limited to, construction, delivery, maintenance and market interest rate;
- Examination of alternative supply options, such as water conservation, water pricing, and reclamation;
- Provisions to ensure that responsibility for funding is borne primarily by the user with no federal subsidy, loan guarantees or use of the borrowing authority of the federal government, unless the proposal is determined by all affected levels of the League to be in the national interest.”

Most of the environmental impacts in the proposed area are irreversible and irretrievable, including negative impacts to 8,048 acres of wetlands in a desert habitat, 305 springs and 112 miles of streams. Groundwater tables would fall between 50 and 200 feet. Hundreds of square miles of ground subsidence would occur. Also, the question of air quality from the resulting dust particles that would impact the health of the people in Utah to the east of the development has not been addressed.

Evaluation of the environmental and social impacts to all areas of the project, including the receiving end in Las Vegas have not been adequately studied. The public there has not had the information in order to make public comments on the affects of the construction in their area.

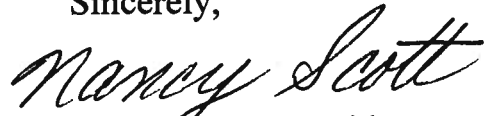
The economic feasibility of the entire project has not been analyzed and presented adequately for review. Funding is uncertain and unstable at this point and the Nevada taxpayer or the United States taxpayer may be asked to help pay for this project in the future.

Lastly, we believe that Las Vegas should work towards becoming a sustainable community that lives within its available resources. When its water allocations are limited, it should stop the sprawl. Also, other conservation methods should be implemented.

Therefore, since monitoring, management, and mitigation measures proposed are inadequate to reduce, avoid, or offset the extreme adverse consequences or the proposed project, we are opposed to its construction.

If the BLM is to uphold its public trust to care for the public lands, its only choice is to select the "No Action" alternative and deny the Right of Way Request.

Sincerely,



Nancy Scott, President

